

**FEDERAL COMMUNICATIONS COMMISSION**  
**445 12th STREET SW**  
**WASHINGTON DC 20554**

**MEDIA BUREAU**  
**AUDIO DIVISION**  
**TECHNICAL PROCESSING GROUP**  
**APPLICATION STATUS: (202) 418-2730**  
**HOME PAGE: [www.fcc.gov/mmb/audio](http://www.fcc.gov/mmb/audio)**

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**JUN 17 2009**

D. Mark Boyd, III  
President  
HRN Broadcasting, Inc.  
P.O. Box 1800  
Raleigh, NC 27602

In re: HRN Broadcasting, Corporation  
WOHS(AM), Cramerton, North Carolina  
Facility Identification Number: 26179  
File Number: BP-20081224AAO

Dear Mr. Boyd:

This letter is in reference to the above-captioned minor change application filed by WOHS(AM) to change site and antenna system, and referencing Exhibit 11 – 19 documents to supply additional information about the “co-channel field strength measuring adaptor”.

A preliminary review of the application reveals that field strength measurements made with the aid of a device referred to as a "co-channel field strength measuring adapter," which allegedly permits the measurement of fields that are below the lowest scale on a typical field strength meter, even in the presence of co-channel interference is not an accepted standard. According to the applicant's engineering exhibit, "(t)he adapter consists of a Switched Capacitor Audio Filter(SCAF), an AC Voltmeter and Signal Generator. A key device ...is a TEXSCAN model RA-54 Precision RF Attenuator...", which are used in conjunction with a Potomac Instruments AM field strength meter. Typically, applicants who wish to rely on field strength measurements take such measurements with a meter calibrated against a known standard, and having a rated accuracy within certain ranges. In many cases, conductivities derived from such measurements allow an AM assignment to be made which might otherwise result in prohibited contour overlap.<sup>1</sup> Consequently, it is important that field strength measurements be properly made with equipment of known accuracy; and all measurements should be repeatable and subject to independent verification. In this case, we have no way of verifying the accuracy of the device in question. In addition the applicant's engineering exhibit states that “Laboratory checks have

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<sup>1</sup> In many parts of the country, ground conductivity exhibits well-known seasonal changes. Applicants typically take advantage of seasonal conductivity shifts by performing field strength measurements when conditions are most advantageous to their proposals.

shown that the readings on the co-channel adapter are virtually indistinguishable from the readings on the FIM across the 100 microvolt and 1 millivolt attenuator ranges of the FIM..." The fact that an independent Lab test, outside the FCC purview, was involved represents a conceivably debatable and biased result. Furthermore, we believe that permitting applicants to use extraordinary means to extract field strength measurement data does not serve the interest of preventing excessive interference in the AM band. Therefore, we will not accept the measurements performed with the "co-channel field strength measuring adapter".

Without using the adapter measurements, we find that the proposed 0.5 mV/m and 0.025 mV/m contours would respectively overlap the 0.025 mV/m and 0.5 mV/m contours of co-channel stations WLTQ(AM), Charleston, South Carolina, WPMC(AM) Goldsboro, North Carolina and WMTC(AM), Vancleve, Kentucky, in violation of Section 73.37(a) of the Commission's rules.

Accordingly, further action on the subject application will be withheld for a period of thirty (30) days from the date of this letter to provide an opportunity to file a curative electronic amendment. Failure to amend or respond within this time period will result in the dismissal of the application pursuant to Section 73.3568 of the Commission's rules.

Sincerely,



Son Nguyen  
Supervisory Engineer  
Audio Division  
Media Bureau

cc: William Culpepper,  
Coe W. Ramsey